

Mediatakeout.com LLC  
130 Church Street  
Suite 267  
New York, NY 10007

May 11, 2016

**VIA ECF**

The Honorable Gregory H. Woods  
United States District Judge  
Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street, Room 2260  
New York, NY 10007

Re: *Christopher Sadowski v. Mediatakeout.com LLC*  
Civil Action No.: 1:16-cv-2701 (GHW)

Dear Judge Woods,

I am counsel for the Defendant, Mediatakeout.com LLC ("Defendant") and I am writing to request an extension of time to respond to the Plaintiff's complaint in the above-entitled action pursuant to Rule 6 (b)(1)(B) of the Federal Rules of Civil Procedure and Your Honor's Individual Rule 1.E.

The Defendant's deadline to respond to the Plaintiff's complaint was on May 2, 2016 as the complaint was filed on April 11, 2016.

The Defendant is making this request for an extension of time because it did not receive notice of the complaint until May 5, 2016. The Plaintiff served the Secretary of State of the State of New York on April 13, 2016 but the Defendant did not receive a copy of the complaint until May 5, 2016. The next day, on May 6, 2016 Defendant's counsel made a motion before this Court to appear on the matter *Pro Hac Vice* which was granted by Your Honor on May 9, 2016. On May 10, 2016, Defendant's counsel sought the Plaintiff's consent for the extension.

The Defendant is requesting an extension of twenty-one (21) days from today to respond to the complaint with a due date of June 1, 2016. This would be the first extension if granted. Plaintiff's counsel also consents to the twenty-one (21) day extension and the extension will not affect any other scheduled dates.

Based on this, the Defendant is requesting an extension of time, an additional twenty-one (21) days from today to respond to the complaint with a due date of June 1, 2016, so it may have an opportunity to respond to the Plaintiff's complaint pursuant to Rule 6 (b)(1)(B) of the Federal Rules of Civil Procedure and/or seek other resolution of the case.

Respectfully submitted  
/s/ *Notoya Green*

Honorable Gregory H. Woods  
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Attorney for the Defendant  
Mediatakeout.com LLC

cc: Richard P. Liebowitz, Esq. (via ECF)